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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91222905
Party	Defendant Pedro Javier Diaz Rangel, Susana Teran
Correspondence Address	POLLIE A GAUTSCH G&A LEGAL APC 2033 SAN ELIJO #201 CARDIFF, CA 92007 UNITED STATES pollie@gandalegal.com
Submission	Answer
Filer's Name	Pollie Gautsch
Filer's e-mail	pollie@gandalegal.com
Signature	/polliegautsch/
Date	09/21/2015
Attachments	Answer to Opposition Reverse 360 pdf.pdf(59894 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 86328601 Int'l Class 25 and published in the Official Gazette June 23, 2015.

4 Pillar Dynasty, LLC)	
)	
)	Opposition No. 91222905
Opposer,)	
)	
-against-)	
)	
Susana Teran and Pedro Javier Diaz Rangel)	
)	
Applicant.)	
)	

ANSWER TO NOTICE OF OPPOSITION

Commissioner for Trademarks
Attention Trial and Appeal Board
PO Box 1451
Alexandria, VA 22313-1451

Dear Sir/Madam:

Applicants, Susana Teran and Pedro Javier Diaz Rangel (hereinafter "Applicant") hereby responds to the Notice of Opposition as follows:

1. Applicant admits the allegations of this paragraph.
2. Applicant denies or has insufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
3. Applicant denies or has insufficient knowledge or information to form a belief as to the truth of the allegations contained therein. Applicant has a website selling its products.

4. Applicant denies or has insufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
5. Applicant denies the allegations of this paragraph.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE-ABSENCE OF DAMAGES: Opposer has not and will not be damaged by the registration of the trademark REVERSE 360 and therefore lacks standing to oppose the registrations.

SECOND AFFIRMATIVE DEFENSE- ABSENCE OF LIKELIHOOD OF CONFUSION: Lanham Act Section 2(d)- the marks of the Applicant compared to the mark of the Opposer (a) are different in sound, appearance, meaning and commercial impression; (b) are unrelated and marketed through different channels of trade; (c) are provided to different classes of consumers; (d) Applicant's asserted marks are weak and entitled to only a narrow scope of protection; (e) there is no evidence of actual confusion; and (f) that recipients of the services are sophisticated and therefore less apt to be confused by the marks.

Applicant hereby gives notice that it may rely on any other defenses that may become available or appear proper during discovery, and hereby reserves its right to amend this Answer to assert any such defenses.

WHEREFORE, Applicant prays that this opposition be dismissed, and that the subject application proceed to registration and for such other and further relief as may be appropriate.

Dated September 21, 2015

Respectfully submitted,

G&A Legal, a professional corporation

Pollie Gautsch

BY: _____

Pollie A. Gautsch
2033 San Elijo #201
Cardiff, California 92007
(858) 345-1067

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Answer to Notice of Opposition on the Correspondent of Record for the Opposer by mailing it via First Class Mail postage prepaid, on the September 21, 2015 at the address indicated below:

Leon Hedvat
Vice-President
4 PILLAR DYNASTY LLC
525 SEVENTH AVENUE 16TH FLOOR NEW YORK, NY 10018

Attorneys for Opposer

Pollie Gautsch

BY: _____
Pollie A. Gautsch
2033 San Elijo #201
Cardiff, California 92007
(858) 345-1067
Attorneys for Applicant